

1 supervisors, don't do any more cleanup on homeless  
2 sites. Do you recall something like that?

3 A. I remember at the initiation of this case  
4 or shortly thereafter, upon advice from the Hamilton  
5 County prosecuting attorney's office, we don't touch  
6 homeless sites.

7 Q. Where did you get your instruction from to  
8 pass on?

9 A. From the Hamilton County prosecuting  
10 attorney's office.

11 Q. Would that be Mr. Stevenson?

12 A. He was one of the voices that went in my  
13 ear, yes.

14 Q. Do you recall any other voices that went  
15 in your ear?

16 A. I believe there was a written opinion that  
17 came down, a memorandum.

18 Q. So somewhere there was a memorandum  
19 concerning cleanup of homeless sites that you recall?

20 A. Yeah, I remember seeing something in  
21 writing. I'm trying to remember who the office was.

22 Q. Before that, was that just about when you  
23 came into the position of supervising some of this  
24 stuff?

25 A. I can't recall. I would have to go back

1 and take a look at the calendar to be absolutely  
2 sure.

3 Q. Okay. Did you ever see any other written  
4 instructions regarding cleanup work?

5 A. No.

6 Q. Did you ever, yourself, pass on memoranda  
7 to field supervisors concerning cleanup of sites  
8 using probationers?

9 MR. STEVENSON: What time frame?

10 BY MR. FELSON:

11 Q. Any time frame.

12 A. Memoranda being something written?

13 Q. Something on a piece of paper.

14 A. No.

15 Q. So anything that you had -- well, did you  
16 ever give any oral instructions to anybody about  
17 cleaning up --

18 A. Oh, yeah.

19 Q. -- sites?

20 A. Yeah.

21 Q. What kind of instructions would you have  
22 been called upon to give? I take this to be after  
23 2001?

24 A. Uh-huh.

25 Q. What kind of instructions would be typical

1 that you would have to give?

2 A. If it's a homeless site, don't touch it.

3 Q. If it's a homeless site, don't touch it.

4 You recall passing that on orally. Any other items  
5 that you might have passed on about cleaning up other  
6 sites?

7 A. No. If it appears to be a homeless site,  
8 don't touch it.

9 Q. Any instructions not involving homeless  
10 sites, like if you go to a certain place, don't go  
11 away -- don't go up -- there was some talk about when  
12 it gets to be slanted too much, it's dangerous.

13 A. Okay. We tell field supervisors or crew  
14 chiefs, if you feel that the environment that is  
15 presented to you is unsafe or that it is a risk for  
16 you to work in that area, you do not put yourself or  
17 your crew at risk.

18 Q. Okay.

19 A. And if there's -- don't go there.

20 Q. And with those instructions, then, they  
21 would be on the site and it would be their  
22 discretion?

23 A. Indeed.

24 Q. And it didn't get as far as saying, well,  
25 if it's a grade more than X percent, don't do it?